



USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 4/7/08

MEMO ENDORSED

OFFICE OF THE DISTRICT ATTORNEY, Bronx County

ROBERT T. JOHNSON  
District Attorney

198 East 161st Street  
Bronx, New York 10451

(718) 590-2140  
Fax 590-6523

April 1, 2008

The Honorable Frank Maas  
United States Magistrate Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 740  
New York, New York 10007-1312

**APPLICATION GRANTED  
SO ORDERED**

  
Frank Maas, USMJ 4/1/08

Re: Jeremiah Maynard v. Brown  
07 Civ. 10480 (WHP) (FM)

Dear Magistrate Judge Maas:

I represent respondent in the above-captioned petition for a writ of habeas corpus, which has a response date of April 18, 2008. I am, however, writing to request a two-month extension to file a response.

I am currently working on a direct appeal to the Appellate Division, First Department, People v. Tyrone Minton. In addition to my own cases, I am also responsible for editing other Assistant District Attorneys on various state motions.

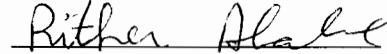
Since being assigned this case, I have filed a response to another federal habeas corpus petition, Paul Watkins v. Ercole (06 Civ. 15222 [PAC] [GWG]) before the Honorable Gabriel W. Gorenstein and have also edited other Assistant District Attorneys on various motions.

Based on the above, I respectfully request an adjournment of sixty days, until June 18, 2008, to file a response.

This is my first request for an extension. I have left messages for petitioner's attorney, Norman P. Bock, Esq., regarding this extension request but have not heard from him yet.<sup>1</sup>

If you have any questions or concerns, please contact me at (718) 590-2140. Thank you for your consideration.

Respectfully,



**RITHER ALABRE**

Assistant District Attorney  
Appeals Bureau

cc: Norman P. Bock, Esq.  
Leibowitz & Bock  
225 Broadway, 41<sup>st</sup> Floor  
New York, New York 10007

---

<sup>1</sup>Upon discovering that petitioner's petition was not accompanied with a memorandum of law, I called his attorney, Mr. Bock, and had numerous conversations with him regarding whether he will file a memorandum of law. Mr. Bock has yet to inform me of his decision. If Mr. Bock chooses to file a memorandum, I respectfully reserve the right to amend this extension request and request additional time to respond.